

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

LEGACY RESTORATION, LLC,

Plaintiff,

- against -

OSWALDO “JUNIOR” BARAJAS,
JOHN DOE ENTITY 1,
LEAH RAFFLES, AND
BRIAN WOLFF.

Defendants.

COMMERCIAL DIVISION

Index No. _____

Plaintiff designates New York County as the place of trial. The basis of venue is C.P.L.R. § 501.

AFFIRMATION OF MELISSA COLÓN-BOSOLET

I, Melissa Colón-Bosolet, hereby affirm under the penalty of perjury, pursuant to [CPLR § 2106](#), that:

1. I am an attorney admitted to practice before the courts of the State of New York and am a partner with the law firm of Sidley Austin, LLP (“Sidley”), counsel for Legacy Restoration, LLC (“Legacy”), in the above-referenced matter.

2. I submit this affirmation in support of Legacy’s application by order to show cause for (1) a temporary restraining order, (2) a preliminary injunction, and (3) such other and further relief the Court deems just and proper (the “Motion”).

3. Pursuant to Commercial Division Rule 20, on June 25, 2025, counsel for Legacy gave actual notice to Defendants Oswaldo “Junior” Barajas, Leah Raffles, and Brian Wolff via phone and either left a voicemail or spoke to the individual on the phone. Counsel for Legacy informed them that we would be filing this action and the Motion on June 25, 2025.

4. It is impossible to provide formal notice at this time to John Doe Entity 1, as its name, location, and other identifying information are unascertainable at this time. However, we

have made a good faith effort to notify John Doe Entity 1 of this TRO application via Defendant Barajas, who Legacy believes is involved with and aware of the details surrounding the formation of this entity, and service to him is good and sufficient in lieu of service on this unknown entity.

5. Pursuant to [CPLR § 2217\(b\)](#), I affirm that the relief requested herein has not been requested of this or any other court or tribunal.

6. Wherefore, I respectfully request the Court grant Legacy's application for (1) a temporary restraining order, (2) a preliminary injunction, and (3) such other and further relief the Court deems just and proper.

I affirm this 25th day of June, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

/s/ Melissa Colón-Bosolet

Melissa Colón-Bosolet

Attorney for Plaintiff

**CERTIFICATION OF COMPLIANCE WITH
COMMERCIAL DIVISION RULE 17**

Pursuant to Rule 17 of the Commercial Division of the Supreme Court, ([22 NYCRR §202.70\(g\)](#)), I hereby certify that this Affirmation is 356 words in length, excluding the caption and signature block. This word count was prepared in reliance upon the word count function of the word-processing system (Microsoft Word), used to prepare this document.

/s/ Melisa Colón-Bosolet

Melissa Colón-Bosolet

Dated: June 25, 2025